

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

JOSEPH COCCHINI,

Plaintiff,

v.

**THE CITY OF FRANKLIN,
TENNESSEE,**

Defendant.

)
)
)
)
)
)
)
)
)
)

Case No. 3:23-cv-1185

MOTION TO RESCHEDULE INITIAL CASE MANAGEMENT CONFERENCE

Comes the defendant, by and through counsel, and respectfully moves for a rescheduled date for the Initial Case Management Conference, currently set for January 10, 2024, at 3:00pm (Doc. 5). Counsel for the defendant is traveling to Fort Worth, Texas for a deposition at the scheduled time. Counsel for the plaintiff was contacted prior to the filing of this motion and voices no objection to the motion.

Respectfully submitted this 18th of December, 2023.

/s/ Gina S. Vogel

Jeffrey R. Thompson, BPR # 020310

Gina S. Vogel, BPR # 033526

Lewis Thomason, PC

620 Market Street, PO Box 2425

Knoxville, TN 37901

jrthompson@lewisthomason.com

gvogel@lewisthomason.com

/s/ Shauna Billingsley

Shauna R. Billingsley, BPR No. 023362

City Attorney

City of Franklin, Tennessee Law Department

109 3rd Avenue South

Franklin, TN 37064

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that on the 18th day of December, 2023, a true and exact copy of this Motion was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt as follows:

Larry L. Crain
Emily A. Castro
Crain Law Group, PLLC
5214 Maryland Way, Suite 402
Brentwood, TN 37027
Larry@crainlaw.legal
Emily@crainlaw.legal
Attorneys for Plaintiff

/s/ Gina S. Vogel